

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
Free Speech Systems LLC,	§	
	§	Case No. 22-60043 (CML)
Debtor.	§	

**PQPR HOLDINGS LIMITED, LLC’S WITNESS AND EXHIBIT LIST FOR
OCTOBER 12, 2022 HEARING**

PQPR Holdings Limited, LLC (“PQPR”), the secured creditor of the Debtor and a party-in-interest, respectfully submits this Witness and Exhibit List for the hearing scheduled for October 12, 2022:

WITNESS LIST

1. Robert Roe
2. David Jones
3. Any witness identified by any other party

EXHIBIT LIST

Exhibit No.	Description
PQPR-1	PQPR August 13, 2020 Note, Exh 4 to Dkt. No. 26
PQPR-2	Security Agreement, Exh 5 to Dkt. No. 26
PQPR-3	PQPR November 10, 2021 Note, Exh 6 to Dkt. No. 26
PQPR-4	PQPR UCC-1 Financing Statement, Exh 7 to Dkt. No. 26
PQPR-5	PQPR Forbearance Term Sheet, Exh 8 to Dkt. No. 26
PQPR-6	13 Week Budget, Exh 9 to Dkt. No. 26
PQPR-7	Interim Cash Collateral Budget, Exh 10 to Dkt. No. 26
PQPR-8	2 nd Interim Cash Collateral Order and Budget, Dkt. No. 98
PQPR-9	3 rd Interim Cash Collateral Order and Budget, Dkt. No. 151
PQPR-10	PQPR Proof of Claim, Claim No. 11
	Any exhibits offered by any other party

Dated: October 10, 2022

Respectfully submitted,

STREUSAND, LANDON & OZBURN, LLP

By: /s/Stephen W. Lemmon

Stephen W. Lemmon

Texas Bar. No. 12194500

STREUSAND, LANDON, OZBURN &
LEMMON, LLP
1801 S. MoPac Expressway, Suite 320
Austin, Texas 78746
Telephone: (512) 236-9900
Facsimile: (512) 236-9904
lemmon@slollp.com
ATTORNEYS FOR
PQPR HOLDINGS LIMITED, LLC

CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2022, the foregoing document was served via electronic mail and/or this Court's ECF notification system on the parties registered to receive such notification. I further certify and a true and correct copy of the foregoing was sent via email or United States first-class mail to the following parties:

Raymond W. Battaglia
LAW OFFICES OF RAY BATTAGLIA, PLLC
66 Granburg Circle
San Antonio, Texas 78218
rbattagliaw@outlook.com
Counsel to the Debtor and Debtor-In-Possession

Kyung S. Lee
R. J. Shannon
SHANNON & LEE LLP
700 Milam Street, STE 1300
Houston, Texas 77002
klee@shannonleellp.com
rshannon@shannonleellp.com
Proposed Counsel to the Debtor and Debtor-In-Possession

Avi Moshenberg
MCDOWELL HETHERINGTON LLP
1001 Fannin Street, Suite 2700
Houston, Texas 77002
E: AVi.Moshenberg@mhllp.com
Counsel for the Texas Plaintiffs

Jarrold B. Martin
**CHAMBERLAIN, HRDLICKA, WHITE,
WILLIAMS & AUGHTRY, PC**
1200 Smith Street, Suite 1400
Houston, Texas 77002
E: jarrod.martin@chamberlainlaw.com
Bankruptcy Counsel for the Texas Plaintiffs

Ryan E. Chapple
CAIN & SKARNULIS PLLC
303 Colorado Street, Suite 2850
Austin, Texas 78701
Email: rchapple@cstrial.com

Randy W. Williams
BYMAN & ASSOCIATES PLLC
7924 Broadway, Suite 104
Pearland, Texas 77581
Email: rww@bymanlaw.com
Bankruptcy Counsel for Connecticut Plaintiffs

Melissa Haselden
Subchapter V Trustee
700 Milam, Suite 1300
mhaselden@haseldenfarrow.com
Trustee

Ha Nguyn
OFFICE OF THE U.S. TRUSTEE
515 Rusk Ave STE 3516
Houston, TX 77002
Ha.Nguyen@usdoj.gov
U.S. Trustee

/s/ Stephen W. Lemmon
Stephen W. Lemmon